

EXHIBIT 1

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**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON**

ROSALYNE SWANSON, individually and
on behalf of all others similarly situated,

Plaintiff,

v.

NATIONAL CREDIT SERVICES, INC., a
Washington corporation,

Defendant.

Case No. 2:19-cv-01504-RSL

**PLAINTIFF'S OBJECTIONS AND
RESPONSES TO DEFENDANT'S
SECOND SET OF
INTERROGATORIES**

PROPOUNDING PARTY: Defendant NATIONAL CREDIT SERVICES, INC.
RESPONDING PARTY: Plaintiff ROSALYNE SWANSON
SET NUMBER: TWO (2)
TO DEFENDANT AND ITS ATTORNEYS OF RECORD:

RESPONSES TO SECOND SET OF
INTERROGATORIES - 1

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Plaintiff Rosalyne Swanson (“Swanson” or “Plaintiff”), by and through her undersigned counsel, objects and responds to Defendant National Credit Services, Inc.’s (“NCS” or “Defendant”) Second Set of Interrogatories as follows: All objections and responses contained herein are based only upon such information presently available to Plaintiff. Further discovery, investigation, research, and analysis may supply additional facts and/or add meaning to known facts. The responses below are given without prejudice to Plaintiff’s right to later produce additional information.

RESPONSES TO INTERROGATORIES

INTERROGATORY NO. 13:

If YOU assert YOU revoked prior express consent with respect to calls made by DEFENDANT to 678-396-8951, please state all facts supporting that contention, including date, time and manner of revocation.

RESPONSE: Objection, this interrogatory seeks information more readily in the custody, control, or possession of Defendant. This interrogatory also calls for a legal conclusion. Without waiving said objections, Plaintiff states that she never provided any prior express consent to NCS to be contacted for the purposes of debt collection. Moreover, Plaintiff states that she never provided her cellular telephone number to NCS, or any of its agents. Plaintiff also believes she requested that NCS stop placing calls to her cellular telephone during at least one call with NCS. Otherwise, investigation continues.

INTERROGATORY NO. 14:

If YOU assert YOU revoked prior express consent with the Department of Education with respect to calls 678-396-8951, please state all facts supporting that contention, including date, time and manner of revocation.

RESPONSE: Objection, this interrogatory seeks information more readily in the custody, control, or possession of Defendant and/or third parties. This interrogatory also calls for a legal

1 conclusion. Without waiving said objections, Plaintiff admits that she provided her cellular
2 telephone number to the Default Resolution Group, U.S. Dept. of Education but not during the
3 transaction that resulted in the debt owed. She never provided any prior express consent to the
4 Department of Education to be called on the number 678-396-8951 for debt collection purposes.

5
6 Respectfully Submitted,

7 **ROSALYNE SWANSON**, individually and on
8 behalf of all others similarly situated,

9 Dated: September 17, 2021

/s/ Patrick H. Peluso
One of Plaintiff's Attorneys

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21 **pro hac vice*
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CERTIFICATE OF SERVICE

The undersigned hereby certifies that a true and correct copy of the above papers was served upon all counsel of record by electronic mail on September 17, 2021.

/s/ Patrick H. Peluso

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VERIFICATION

I, Rosalyn Swanson, of full age, verify as follows:

I have read the foregoing responses to Interrogatories (excluding objections, legal conclusions, or matters that are of public record) and verify that they are true, accurate and complete based upon my personal knowledge of the information contained in them, except as set forth below.

VERIFICATION - 1

Woodrow & Peluso, LLC
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Ph: 720-213-0675

1 I verify under penalty of perjury that the foregoing is true and correct. Executed on
2 September 17, 2021.

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4 *Rosalyne Swanson*

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6 Rosalyne Swanson
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27 VERIFICATION - 2
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